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MEMORANDUM

To: Chairman, Federal Communications Commission

From: David McGlasson, PE, PLS

Subject: Application by LightSquared for Terrestrial-Based Broadband Network

Date: August 11, 2011

Our firm is gravely concerned over the damage that will be done to our business, and to the investment we have made in GPS equipment, by the LightSquared proposal above.

Our engineering, land surveying, planning, environmental consulting, GIS and mapping work all rely heavily on data collected by ourselves and others using GPS equipment. Our firm employs over 100 people, making us the largest such firm in the Central Valley of California. We generate nearly \$20 million in revenue annually, the vast majority directly or indirectly relying upon GPS technology. Our own equipment investment is several hundred thousand dollars. To say that we would be affected by loss of that GPS capability would be to massively understate the case.

There was a day 10 or 15 years ago when we did not have GPS technology available. Since then, we have added many services that are simply not possible without it, including GIS-based mapping, BIM services for the oil/gas pipeline industry, composite utility mapping for municipal and agricultural water resources agencies and many more. Those of our staff who provide such services would simply be out of work, and those clients who rely on ongoing maintenance of their databases and maps would be left hanging.

Near-universal broadband internet service is a worthy goal, certainly one this country should aspire to achieve. However, nothing about that goal should give it priority over the investment that millions of American companies and thousands of public agencies have already made in satellite-based GPS equipment and services. No company has the right to simply destroy our investment, no matter how worthy the goal. Neither does any government agency have the right to sanction that destruction, which is precisely what FCC would be doing by granting LightSquared's petition. The testing has been done, you have the evidence of the damage available to you. In your positions as protectors of the public airwaves, you have the unmistakable obligation to follow earlier presidential directives to protect GPS service from ground-based interference. No end, however worthy, justifies the means that are proposed here.

The test results have been so conclusive that it is apparent that no "modification" of the proposal will redress the potential harm. FCC must deny the petition, and direct LightSquared to come up with a new proposal that will effectively protect not only the huge group of existing GPS users, but also the existing users of all other spectrums as well.